

STATE OF SOUTH CAROLINA

(Caption of Case)

South Carolina Electric & Gas Co. Application for  
Mid-Year Adjustment in Two Phases of the Base  
Rates Charged by SCE&G for the Recovery of the  
Fuel Costs Associated with its Service to Retail  
Electric Customers

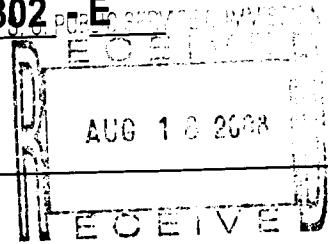
BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 302 - E

# 2 - 10/20/08 10:30



(Please type or print)

Submitted by: Scott Elliott

Address: 721 Olive Street  
Columbia, SC 29205

SC Bar Number: 1872

Telephone: 803-771-0555

Fax: 803-771-8010

Other:

Email: sellott@elliottlaw.us

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

RECEIVED  
AUG 18 2008  
PSC SC  
DOCKETING DEPT.

ORIGINAL

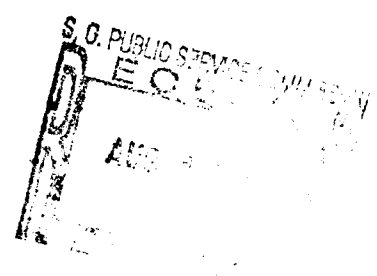
ELLIOTT & ELLIOTT, P.A.  
ATTORNEYS AT LAW  
721 OLIVE STREET  
COLUMBIA, SOUTH CAROLINA 29205  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
FACSIMILE (803) 771-8010

August 15, 2008

Mr. Charles L.A. Terreni  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211



RE: Application of South Carolina Electric & Gas Company for Mid-Period  
Adjustment in Two Phases of Base Rates Charged by South Carolina  
Electric and Gas Company for the Recover of Fuel Costs Associated  
with Its Service to Retail Electric Customers  
Docket No. 2008-302-E

Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

1/0 I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the stamped self-addressed envelope enclosed for your convenience. If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/jcl

Enclosures

cc: All parties of record (w/Encl.)

RECEIVED

AUG 18 2008

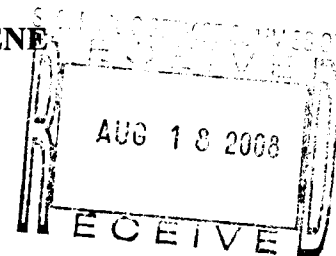
PSC SC  
DOCKETING DEPT.

ORIGINAL

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2008-302-E

IN THE MATTER OF: )  
 )  
South Carolina Electric & Gas Company )  
Application for Mid-Period Adjustment in )  
Two Phases of the Base Rates Charged by )  
SCE&G for the Recovery of the Fuel Costs )  
Associated with Its Service to Retail )  
Electric Customers )

PETITION TO INTERVENE



The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. On August 5, 2008, South Carolina Electric & Gas ("SCE&G") filed an application with the South Carolina Public Service Commission ("Commission") requesting that the Commission order in two phases a mid-period increase of the base rates charged by SCE&G for the recovery of its fuel costs associated with its service to retail electric customers.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.

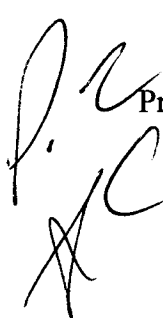
3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:



Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
Telephone: 803-771-0555  
Fax: 803-771-8010  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

- c. For such other and further relief as is just and proper.

p.3



---

Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
721 Olive Street  
Columbia, S.C. 29205  
(803) 771-0555

Attorney for the South Carolina Energy  
Users Committee

Columbia, South Carolina  
August 15, 2008

## **CERTIFICATE OF SERVICE**

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Combined Application of South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order for the Construction and Operation of a Nuclear Facility at Jenkinsville, South Carolina

DOCKET NO.: 2008-302-E

**PARTIES SERVED:**

Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

Shannon Bowyer Hudson, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

K. Chad Burgess, Esquire  
Willoughby & Hoefer, P.A.  
1426 Main Street,  
Mail Code 130  
Columbia, SC 29201

Damon E. Xenopoulos, Esquire  
Brickfield Burchette Ritts &  
Stone, PC  
1025 Thomas Jefferson St., NW  
8<sup>th</sup> Floor, West Tower  
Washington, DC 20007

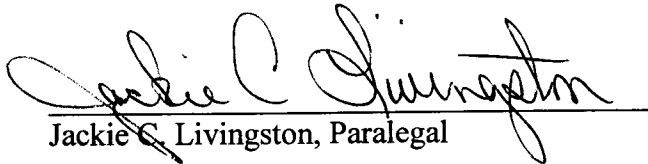
E. Wade Mullins, III, Esquire  
Bruner Powell Robbins Wall &  
Mullins, LLC  
P. O. Box 61110  
Columbia, SC 29260

Joey R. Floyd, Esquire  
Bruner, Powell, Robbins, Wall  
& Mullins, LLC  
1426 Main Street  
MC 130  
Columbia, SC 29201

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA  
ENERGY USERS COMMITTEE

August 15, 2008

  
Jackie C. Livingston, Paralegal